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BY ECF

Hon. Ronald L. Ellis
United States District Court
500 Pearl Street, Suite 1970
New York, NY 10007-1312

Re: Pinks, et al. v. M&T Bank - 13 Civ. 1730 (LAK)(RLE)

Dear Magistrate Judge Ellis:

We are responding to Mr. Arnold's letter of April 14, 2016 (DI 130), concerning scheduling of certification briefing. Following Your Honor's Order of March 25, 2016, (DI 126), there are no longer any class-related discovery issues outstanding from the Plaintiff's side.

Earlier in the week, we had proposed to Mr. Arnold that Plaintiff's initial certification motion and briefing be filed within twenty-one (21) days of a final ruling on Plaintiff's pending Motion to Redesignate and to Dismiss (DI 128, 129 refiled as 131, 132.) We take no position on the amount of time needed for M&T's Opposition. We request an additional 21 days thereafter to file our Reply.

Respectfully,

s//Daniel V. Gsovski

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cc: All counsel (by ECF)